

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Stanford Eugene LARKIN

Case: 2:21-mj-30572

Assigned To : Unassigned

Case No.

Assign. Date : 12/3/2021

Description: CMP USA v. LARKIN (SO)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 2, 2021 in the county of Washtenaw in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 922(g)(1)

Felon in possession of a firearm

18 U.S.C. 924(c)

Possession of a firearm in furtherance of drug trafficking crime

21 U.S.C. 841(a)(1)

Possession of a controlled substance with intent to distribute

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: December 3, 2021City and state: Detroit, Michigan

*Complainant's signature*Special Agent Joshua Loy - ATF*Printed name and title*

*Judge's signature*Honorable Jonathan J.C. Grey, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent Joshua Loy, being duly sworn, do hereby state the following:

**I. INTRODUCTION**

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since June 2018. I am currently assigned to the Ann Arbor Field Office, Detroit Field Division, where I am tasked with investigating violations of firearms and controlled substances laws. I have conducted numerous investigations involving violations of federal firearms and controlled substances laws, which have resulted in the seizure of firearms and narcotics. In addition, I have graduated from the Federal Law Enforcement Training Center and the ATF Special Agent Basic Training.

2. The statements contained in this affidavit are based on information provided to me by and/or through other law enforcement agents, investigators, and individuals with knowledge of this matter, and my investigation. This affidavit summarizes such information, but it does not provide each and every detail that I know regarding this investigation. Instead, it merely provides information necessary to establish probable cause that Stanford LARKIN has violated Title 18, United States Code, Sections 922(g)(1), possession of a firearm by a convicted felon; Title 18, United States Code, Section 924(c), possession of a firearm in

furtherance of drug trafficking crime; and Title 21, United States Code, Section 841(a)(1), possession of a controlled substance with intent to distribute.

3. A criminal history computerized check of LARKIN revealed that he has been convicted of at least the following felonies:

- a. 2010- Felony Weapons- Carrying Concealed;
- b. 2017- Felony Weapons- Carrying Concealed, Felony Weapons- Possession by Felon;
- c. 2018- Felony Controlled Substance – Del/Mfg; and
- d. 2019- 18 USC 922 (g)(1) Felon in possession of a firearm  
(Eastern District of Michigan, Case No. 18-cr-20634)

## **II. SUMMARY OF THE INVESTIGATION**

4. On December 2, 2021, Michigan State Police (MSP) conducted a traffic stop of Stanford LARKIN in Ypsilanti Township, Michigan, after observing LARKIN conduct what was believed to be an illegal narcotics transaction. A drug-sniffing dog indicated there were illegal narcotics in the vehicle.

5. Officers searched the vehicle and found approximately 43 grams (gross) of suspected heroin, approximately 51 grams (gross) of suspected cocaine, and approximately 37 grams (gross) of suspected crack cocaine located in a black box in a red backpack located on the rear passenger seat of the vehicle (within arm's reach of LARKIN). In addition, one loaded Glock, model 20, 10mm pistol

was located underneath the driver's seat of the vehicle. Officers also found at least one digital scale and two cell phones in the vehicle, along with other items, including approximately \$1,000 in cash. Based on my training and experience, the quantity of controlled substances, the manner in which they were packaged, the money, the scales, and the firearm are consistent with the trafficking of illegal controlled substances. Field tests of the suspected narcotics were conducted which were revealed positive results for fenethyllene, cocaine, and crack cocaine.

6. In addition, while in transport to the Washtenaw County Jail, LARKIN asked MSP TFO Tisch about the status of his \$3,000, which he stated was in the red backpack. MSP TFO Tisch asked LARKIN where the currency was located in the backpack, and LARKIN specified which pocket in the backpack MSP TFO Tisch could find the money. Upon return to the LAWNET Office, MSP TFO Tisch located \$3,000 in cash where LARKIN stated it would be located.


7. I conferred with ATF S/A Mike Parsons, an Interstate Nexus Firearms expert, who indicated that the Glock, model 20, 10mm handgun, was not manufactured in the State of Michigan. Therefore, the firearm had traveled in or affected interstate or foreign commerce.

8. There is probable cause to believe that LARKIN knew on December 2, 2021, that he had previously been convicted of a crime punishable by imprisonment for more than one year. On June 3, 2019, LARKIN was sentenced to

a term of 35 months' imprisonment in the Eastern District of Michigan, after pleading guilty to possession of a firearm by a convicted felon. He completed that sentence and was released on May 14, 2021.

### III. CONCLUSION

9. Based upon the above information, I believe there is probable cause Stanford LARKIN has violated Title 18, United States Code, Section 922(g)(1), possession of a firearm by a convicted felon; Title 18, United States Code, Section 924(c), possession of a firearm in furtherance of drug trafficking crime; and Title 21, United States Code, Section 841(a)(1), possession of a controlled substance with intent to distribute.

  
Special Agent Joshua Loy  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn to and subscribed before me  
and/or by reliable electronic means.

  
HONORABLE JONATHAN J.C. GREY  
UNITED STATES MAGISTRATE JUDGE

Date: December 3, 2021

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Bureau of Alcohol, Tobacco,  
Firearms and Explosives

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HONORABLE JONATHAN J.C. GREY  
UNITED STATES MAGISTRATE JUDGE

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